
UNITED STATES OF AMERICA

v.

IBRAHIM AHMED MAHMOUD AL QOSI

)
)
) **GOVERNMENT NOTICE**
) **OF MOTION**
) **(Pre-Admission of**
) **Evidence)**
)

) 23 July 2004
)

The Prosecution in the case of the *United States v Ibrahim Ahmed Mahmoud al Qosi* provides the following notice of motion:

1. This Notice is filed in accordance with the Presiding Officer's Order of 19 July 2004.
2. Relief Requested: The Prosecution will request pre-admission of certain testimonial, documentary, physical, and demonstrative evidence that it intends to use at trial.
3. Synopsis of Legal Theory: The Prosecution will seek to pre-admit under Military Commission Order No. 1 (MCO No. 1), § 6(D) certain evidence that it intends to use at trial. Pre-admission of evidence will assist the Presiding Officer and the Commission in ensuring the expeditious conduct of the trial pursuant to MCO No. 1, § 4(A)(5)(c) and §6(B)(2).
4. Witnesses and Evidence: Witness and evidence requirements will depend on the Defense response to the motion and to proposals by the Prosecution for stipulations of fact by the parties and conclusive notice of facts by the Commission pursuant to MCO No. 1, § 6(D)(4).
5. Oral Argument: The Prosecution requests oral argument on this motion.
6. Request for Extension of Time: The Prosecution respectfully requests an extension of the filing date with regard to this motion until a time closer to trial when discovery is nearer to completion, the parties have had an opportunity to address evidentiary issues, and the issue of pre-admission is more ripe. A grant of such a delay would prevent multiple, piece-meal pre-admission motions.

//Signed//

NAME REDACTED

Lieutenant Colonel, U.S. Marine Corps
Prosecutor

Revised: The names of prosecutors were redacted at the request of the Office of Military Commissions.